



**COUNTY OF LOS ANGELES
DEPARTMENT OF AUDITOR-CONTROLLER**

KENNETH HAHN HALL OF ADMINISTRATION
500 WEST TEMPLE STREET, ROOM 525
LOS ANGELES, CALIFORNIA 90012-3873
PHONE: (213) 974-8301 FAX: (213) 626-5427

WENDY L. WATANABE
AUDITOR-CONTROLLER

ASST. AUDITOR-CONTROLLERS

ROBERT A. DAVIS
JOHN NAIMO
JAMES L. SCHNEIDERMAN
JUDI E. THOMAS

October 20, 2011

TO: Supervisor Michael D. Antonovich, Mayor
Supervisor Gloria Molina
Supervisor Mark Ridley-Thomas
Supervisor Zev Yaroslavsky
Supervisor Don Knabe

FROM: Wendy L. Watanabe
Auditor-Controller

SUBJECT: **PROBATION DEPARTMENT – JUVENILE CAMP DEPARTMENT OF
JUSTICE SETTLEMENT AGREEMENT MONITORING FOR JUNE 1,
2011 THROUGH AUGUST 31, 2011 – THIRD STATUS REPORT**

On August 17, 2010, your Board instructed the Auditor-Controller (A-C) to monitor the County Probation Department's (Probation) progress toward implementing the provisions of the federal Department of Justice (DOJ) settlement agreement. This is our third status report. The settlement agreement covers eighteen Probation camps and six specialized units. However, five of the Probation camps were not open during our review period. In addition, Probation is revising the monitoring tool applicable to one specialized unit. As a result, our review was limited to thirteen camps and five specialized units.

We are responsible for monitoring the status of 26 of the 41 provisions from the DOJ settlement agreement. Twelve of the other fifteen provisions will be monitored by the County Department of Mental Health (DMH) because they require a mental health specialist, and the remaining three provisions are administrative issues that do not require formal monitoring. Because of the differences in juvenile populations and services among Probation's camps and units, some of the settlement agreement provisions only apply to some of the camps/units. It should be noted that the number of provisions the A-C is responsible for monitoring decreased from 27 to 26 since our last review. This is due to Probation and a DOJ Monitor deciding that DMH should monitor Provision 28 - Care for Self Harming Youth, because the Provision requires a mental health specialist.

We monitored each provision of the settlement agreement using a monitoring tool developed and agreed to by Probation and a DOJ Monitor. The monitoring tools include specific criteria, which result in a precise score. Of the 26 provisions we are responsible for monitoring, we could only review 17 because Probation and the DOJ Monitor had not developed the monitoring tools for eight provisions, and were revising the monitoring tool for one provision.

Results of Review

Our review disclosed that Probation continues to make progress in complying with the 17 provisions we monitored. As noted in the following table, the Department was in substantial compliance (90% or greater compliance level) with nine (53%) of the seventeen provisions reviewed. Five provisions have a compliance level of 70% to 89%, and only three provisions have a compliance level of 69% or less.

Compliance Level	Number of Provisions		
	As of Feb 28, 2011	As of May 31, 2011	As of Aug 31, 2011
90% or higher	3	6	9
70% to 89%	4	7	5
69% or less	11	5	3

The table above shows the overall compliance levels for all the provisions we monitor. It should be noted that that compliance level for three provisions (Provision 14 - Consumption of Alcohol by Staff; Provision 29 - Documentation of Suicide Precautions; and Provision 45 - Staff Understanding of Mental Health and Developmental Disability Needs) were lower in our current review, compared to our prior review. Probation's compliance level for Provision 45 declined significantly (from 42% to 8%) due to changes Probation made to the monitoring tool since our last review. The changes placed a greater importance on the number of staff who had completed the training.

Once the DOJ Monitor determines that Probation has met most of a provision's requirements, Probation will achieve the status of "substantial compliance" for that provision. The DOJ monitor will then authorize placing the provision into "formal monitoring" and will continue to track Probation's compliance. If Probation continues to meet the requirements of the provision for twelve consecutive months, the DOJ Monitor will consider Probation to have fully met the requirements of that provision. The settlement agreement requires the County to fully meet the requirements of all provisions by October 2012.

Attachment 1 is the detailed results of our monitoring for the 17 provisions. Attachment 2 shows the compliance level of each provision in our current review, and the compliance levels from our prior reviews. Attachment 3 lists the compliance levels for each provision at each camp/unit.

Review of Report

We discussed the results of our review with Probation management, who indicated general agreement with the results of our review. They also indicated they will continue to work with the DOJ to implement all of the provisions of the settlement agreement. We thank Probation management and staff for their cooperation and assistance during our review.

Please call me if you have any questions, or your staff may contact Don Chadwick at (213) 253-0301.

WLW:JLS:DC:AA:GH

Attachments (3)

c: William T Fujioka, Chief Executive Officer
Donald H. Blevins, Chief Probation Officer
Calvin C. Remington, Chief Deputy, Probation Department
Marvin J. Southard, D.S.W., Director, Department of Mental Health
Mitchell H. Katz, M.D., Director, Department of Health Services
Arturo Delgado, Ed.D., Superintendent, Los Angeles County Office of Education
Public Information Office
Audit Committee

**LOS ANGELES COUNTY PROBATION CAMPS
JUVENILE CAMP DOJ SETTLEMENT AGREEMENT MONITORING RESULTS
FOR JUNE 1 THROUGH AUGUST 31, 2011**

Scope of Review

We are responsible for monitoring 26 of the 41 provisions from the Department of Justice (DOJ) settlement agreement. Twelve of the other fifteen provisions will be monitored by the County Department of Mental Health (DMH) because the provisions require a mental health specialist. The remaining three provisions are administrative issues that do not require formal monitoring.

Probation's progress in implementing each provision of the settlement agreement is evaluated using a monitoring tool developed and agreed to by Probation and a DOJ monitor. The monitoring tools include specific criteria, which result in a precise score. Of the 26 provisions we are responsible for monitoring, we could only review 17 of them because Probation and the DOJ Monitor had not developed the monitoring tools for eight provisions, and were revising one.

Our review covered the thirteen camps and five specialized units that were open during our monitoring period of June 1 through August 31, 2011.

Provision 10: Use of Force

The County shall develop and implement a comprehensive policy and accompanying practices governing use of force, ensuring that the least amount of force necessary for the safety of staff, youth residents, and visitors is used on youth.

This Provision applies to thirteen camps and three specialized units.

Average Compliance Level: 96%

Comments:

Fifteen (94%) of the sixteen camps/units achieved substantial compliance of 90% or more. The remaining camp (Kilpatrick) achieved a compliance level of 86%. The Camp Kilpatrick Director did not ensure that all staff had signed-off on Probation's Safe Crisis Management policy. Specifically, 11 (18%) of the 60 active staff at the Camp did not sign-off on the policy.

Provision 11: Oleoresin Capsicum (OC or Pepper) Spray

The County shall develop and implement policies, procedures, and practices to restrict the use of OC spray to appropriate circumstances; enable supervisors to maintain appropriate controls over spray use and storage; restrict the carrying of OC spray to individuals who need to carry and use it; prevent the use of OC spray, wherever

possible, on populations for whom its use is contraindicated or contrary to doctors' instructions; and ensure that decontamination occurs properly.

This Provision is only applicable to the Security Unit at the Challenger Memorial Youth Center (CMYC), which administers the Pepper spray canisters at three camps and two specialized units located at CMYC.

Compliance Level: 93%

Comments:

The Security Unit was in substantial compliance with this Provision. The DOJ Monitor approved this Provision for formal monitoring effective February 28, 2011.

Provision 12: Use of Force Review

The County shall develop and implement a system for senior management to review use of force and alleged child abuse, so they can use the information to improve training and supervision of staff, guide staff discipline, and make needed policy/programmatic changes.

This Provision applies to thirteen camps and four specialized units.

Average Compliance Level: 89%

Comments:

Ten (59%) of the seventeen camps/units achieved substantial compliance of 90% or more. The remaining seven camps/units achieved an average compliance level of 82%. Generally, the managers at the seven camps/units did not always ensure that supervisors completed their reviews of use of force incidents within five business days, as required. Specifically, the supervisors at the seven camps/units completed their reviews an average of twelve days late for 28 (49%) of the 57 incidents we examined.

Provision 14: Consumption of Alcohol by Staff

The County shall ensure that staff at the Probation Camps do not maintain or consume alcohol at the Camps.

This Provision applies to ten camps and two specialized units, including the Security Unit at CMYC, which covers the three camps and two units located at CMYC.

Average Compliance Level: 82%

Comments:

Probation management implemented a policy forbidding the possession of alcohol, drugs, and weapons in Probation juvenile facilities. Probation staff had signed-off on the policy. Our interviews indicated that staff understood the policy.

In addition, Probation planned to conduct random searches for these items. However, Probation had not started the random searches due to concerns raised by some employee bargaining units. Probation management indicated that all camps will be conducting random searches during our next review period.

The DOJ Monitor approved this Provision for formal monitoring effective February 28, 2011. Probation management explained that the DOJ Monitor placed the Provision in formal monitoring with the understanding that Probation would implement searches in the immediate future.

Provision 16: Orientation

The County shall ensure that all youth, including those who are disabled or Limited English Proficient, receive orientation sufficient to communicate important information, such as how to access the grievance system, medical care and mental health services, or report staff misconduct.

This Provision applies to thirteen camps and one specialized unit.

Average Compliance Level: 99%

Comments:

Thirteen (93%) of the fourteen camps/units achieved substantial compliance of 90% or more. The remaining camp (Onizuka) achieved a compliance level of 89%. Specifically, two (18%) of the eleven minors admitted into the Camp in July 2011 were not oriented the same day. The two minors were oriented an average of six days after being admitted. The DOJ Monitor approved this Provision for formal monitoring effective November 30, 2010.

Provision 18: Staff Training and Supervision of Youth

The County shall ensure that staff who work with youth residents have the knowledge and skills needed to effectively manage youth, including de-escalation techniques, crisis intervention, youth development, and supervision.

This Provision applies to thirteen camps and three specialized units.

Average Compliance Level: 89%

Comments:

Ten (63%) of the sixteen camps/units achieved substantial compliance of 90% or more. The remaining six camps/units achieved an average compliance level of 82%. Probation management developed training classes for staff and supervisors on effectively managing youth, including de-escalation techniques, crisis intervention, and youth development. However, Probation management at the six camps did not ensure that all supervisors and probation officers completed the training. Specifically, 79% of the supervisors and 14% of the Probation Officers assigned to the six camps did not complete the training.

Provision 19: Reduction of Youth on Youth Violence (YOYV)

The County shall develop and implement strategies for reducing youth on youth violence (YOYV) that includes training staff in appropriate behavior management, recognition and response to gang dynamics, and violence reduction techniques.

This Provision applies to thirteen camps and three specialized units.

Average Compliance Level: 92%

Comments:

Thirteen (81%) of the sixteen camps/units achieved substantial compliance of 90% or more. The remaining three camps/units achieved an average compliance level of 70%. The managers at the three camps did not always ensure that minors who engaged in fights completed a YOYV contract agreeing not to engage in additional fights. The three camps did not provide YOYV contracts for 28 (36%) of the 78 minors who engaged in fights during June 2011. In addition, the managers at the three camps did not always perform a review of the YOYV incidents. Specifically, the managers could not provide documentation to support their review for 11 (37%) of the 30 incidents that occurred during June 2011.

Provision 20: Child Abuse Reporting

The County shall develop policies, practices and procedures to define those circumstances in which staff must report allegations of child abuse or neglect to the appropriate external agencies.

This Provision applies to thirteen camps and three specialized units.

Average Compliance Level: 88%

Comments:

Six (38%) of the sixteen camps/units achieved substantial compliance of 90% or more. The remaining ten camps/units achieved an average compliance level of 84%. Probation developed policies and procedures to define circumstances when staff must report allegations of child abuse or neglect. However, Probation management did not ensure that all staff working at the facilities completed training on the policies/procedures. Specifically, 19% of Probation Officers and 39% of non-peace officer staff from Probation, Juvenile Court Health Services (JCHS), and Los Angeles County Office of Education (LACOE) assigned to the ten camps/units did not complete the training.

Provision 21: Child Abuse Investigation

The County shall develop and implement a system for the timely, thorough, and independent investigation of alleged child abuse. Staff that is the subject of an allegation of child abuse shall be removed from direct youth supervision pending the outcome of the referral or investigation.

This Provision only applies to the Child Abuse Special Investigations Unit (CASIU).

Compliance Level: 62%

Comments:

Probation staff did not always submit completed investigations to their supervisors for approval within the required 90-day timeframe. Specifically, 13 (46%) of the 28 investigations completed from May through July 2011 were not submitted to the supervisors within 90 days. Investigators took an average of 128 days to submit the 13 investigations to their supervisors. In addition, the staff did not obtain supervisor approvals to extend the time to complete the investigations.

Probation is also required to complete the investigations, including supervisor review, within 120 days. As of July 31, 2011, four (19%) of CASIU's 21 active investigations had been open for an average of 204 days.

In addition, for 11 (39%) of the 28 cases we reviewed, Probation did not provide documentation to show that they sent the investigation to Office of Independent Review for review as required.

Provision 22: Classification

The County shall develop and implement a classification system that considers factors, including youth age, committing offense, gang affiliation, delinquency history and treatment needs, to reasonably ensure that youth are placed safely within the Probation Camps, and provides for reclassification in appropriate circumstances.

This Provision applies to thirteen camps and three specialized units.

Average Compliance Level: N/A

Comments:

Probation management requested that we suspend monitoring of this Provision until they revise the monitoring tool for this Provision. Probation management subsequently provided the revised monitoring tool on October 7, 2011.

Provision 23: Grievance System

The County shall develop an effective grievance system to which youth have access when they have complaints, ensure that grievances may be filed confidentially, and ensure that they receive appropriate follow-up, including informing the author of the grievance about its outcome, and tracking implementation of resolutions. The County shall ensure that the grievance system provides youth with a safe avenue to report abuse, staff misconduct, or unfair treatment.

This Provision applies to thirteen camps and two specialized units.

Average Compliance Level: 98%

Comments:

All fifteen camps/units achieved substantial compliance of 90% or more. The DOJ Monitor approved this Provision for formal monitoring effective February 28, 2011.

Provision 24: Youth Movement Between the Probation Camps or Between the Probation Camps and the County Juvenile Halls

The County shall ensure that movement of youth residents between facilities does not interfere with ongoing testing or provision of medical, mental health, or educational services at the camps, unless court proceedings, treatment, or security needs require such movement.

This Provision applies to thirteen camps and one specialized unit.

Average Compliance Level: 98%

Comments:

All fourteen camps/units achieved substantial compliance of 90% or more. The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2010.

Provision 25: Development and Implementation of Suicide Prevention Policy

The County shall develop and implement adequate policies, procedures, and practices relating to suicide prevention.

This Provision applies to thirteen camps and three specialized units.

Average Compliance Level: 96%

Comments:

All sixteen camps/units achieved substantial compliance of 90% or more. The DOJ Monitor approved this Provision for formal monitoring effective October 31, 2010.

Provision 29: Documentation of Suicide Precautions

The County shall develop and implement policies, procedures, and practices to ensure that the following information is thoroughly and correctly documented, and provide information to all staff who need to know such information: a) the times youth are placed on and removed from precautions; b) the levels of precautions on which youth are maintained; c) the housing locations of youth on precautions; d) the conditions of the precautions; and the times and circumstances of all observations by staff monitoring the youth.

This Provision applies to thirteen camps and two specialized units.

Average Compliance Level: 66%

Comments:

Two (13%) of the fifteen camps/units achieved substantial compliance of 90% or more. The remaining thirteen camps/units achieved an average compliance level of 62%. DMH staff at the thirteen camps did not always notify Probation of each clinical contact they had with the minors, and inform them whether there were any changes in the minors' needs. In addition, Probation staff did not always initial the required documents acknowledging that they reviewed and understood DMH's comments describing the mental health needs of the minors under their control.

Since our last review, Probation's average compliance level for this Provision decreased from 85% to 66%. This was due to an overall reduction in DMH and Probation staff's compliance with the requirements described in the paragraph above.

Provision 32: Training (Suicide Prevention)

The County shall ensure that all Camp staff who work with youth are sufficiently trained in suicide prevention so that they understand how to prevent and respond to crises,

including practical matters, such as the location and use of a cut-down tool if a youth attempts to hang him/her self.

This Provision applies to thirteen camps and three specialized units.

Average Compliance Level: 86%

Comments:

Five (31%) of the sixteen camps/units achieved substantial compliance of 90% or more. The remaining eleven camps/units achieved an average compliance level of 82%. Probation management developed a training class on suicide prevention. However, Probation management did not ensure that all staff at the facilities received the training. Specifically, 19% of Probation Officers and 22% of non-peace officer staff from Probation, JCHS, and LACOE assigned to the 11 camps/units did not complete the training.

Provision 34: Screening

The County shall develop and implement policies, procedures, and practices for initial mental health screening to allow the identification of previously diagnosed and potentially existing mental health or substance abuse disorders, including potential suicidality. Such screening shall take place within 48 hours prior to a youth's arrival at a Camp, or within 24 hours after a youth's arrival at a camp.

This Provision applies to thirteen camps and two specialized units.

Average Compliance Level: 97%

Comments:

Fourteen (93%) of the fifteen camps/units achieved substantial compliance of 90% or more. The remaining camp (Camp McNair) achieved a compliance level of 88%. Probation managers at Camp McNair did not always ensure that the required screening documentation was placed in the minors' behavioral charts. Specifically, two (40%) of the five behavior charts we reviewed did not contain a copy of the required initial screening results. The DOJ Monitor approved this Provision for formal monitoring effective February 28, 2011.

Provision 45: Staff Understanding of Mental Health and Developmental Disability Needs

The County shall ensure that all staff working with youth residents have the skills and information necessary to understand behaviors of, engage in appropriate interactions with, and respond to needs of youth with mental illness and developmental disabilities.

This Provision applies to thirteen camps and three specialized units.

Average Compliance Level: 8%

Comments:

Probation management developed a training class that covered the requirements of this Provision. However, Probation management did not ensure that all staff working at the facilities completed the training. Specifically, Probation, LACOE, and JCHS management provided documentation to show that only 8% of the staff assigned to the camps had completed the training.

Since our last review, Probation's average compliance level for this Provision decreased from 42% to 8%. This was primarily due to changes Probation had made to the monitoring tool. Probation management indicated that the changes were needed to more closely align the monitoring tool with the DOJ Monitor's expectations.

Provision 46: Discharge Summaries

The County shall provide aftercare planning and discharge summaries for youth leaving the facility who have, or have had, open mental health cases at a Camp to facilitate treatment in future placements.

This Provision applies to thirteen camps and one specialized unit.

Average Compliance Level: 97%

Comments:

Thirteen (93%) of the fourteen camps/unit achieved substantial compliance of 90% or more. The remaining camp (Camp Paige) achieved a compliance level of 79%. The DOJ Monitor approved this Provision for formal monitoring effective February 28, 2011.

**DOJ Settlement Agreement Provision
Monitored by the Auditor-Controller
Compliance Level Summary
For Monitoring Reviews Completed Through August 31, 2011**

Provision	Description	Monitoring Results (2)		
		Feb 28, 2011	May 31, 2011	Aug 31, 2011
9 (1)	Protection from Abusive Practices	N/A	N/A	N/A
10	Use of Force	22%	95%	96%
11	Chemical Restraint	50%	95%	93%
12	Use of Force Review	50%	88%	89%
13 (1)	Threat and Intimidation	N/A	N/A	N/A
14	Consumption of Alcohol by Staff	85%	85%	82%
15 (1)	Staffing	N/A	N/A	N/A
16	Orientation	95%	97%	99%
17 (1)	Rehabilitation & Behavior Management	N/A	N/A	N/A
18	Staff Training and Supervision of Youth	19%	61%	89%
19	Youth-on-Youth Violence (YOYV)	83%	92%	92%
20	Child Abuse Reporting	34%	51%	88%
21	Child Abuse Investigation	40%	48%	62%
22	Classification	33%	76%	(3)
23	Grievance System	91%	92%	98%
24	Youth Movement Between Probation Camps and/or Halls	42%	80%	98%
25	Development and Implementation of Policy (Suicide Prevention)	88%	96%	96%
27 (1)	Management of Suicidal Youth	N/A	N/A	N/A
29	Documentation of Suicide Precautions	69%	85%	66%
30 (1)	Supervision of Youth at Risk of Self Harm	N/A	N/A	N/A
31 (1)	Suicide Precautions for Youth Awaiting Transfer to Another Facility	N/A	N/A	N/A
32	Training (Suicide Prevention)	38%	57%	86%
34	Screening	91%	89%	97%
43 (1)	Substance Abuse	N/A	N/A	N/A
45	Staff Understanding of Mental Health and Developmental Disability Needs	37%	42%	8%
46	Discharge Summaries	53%	87%	97%
Average Overall		58%	78%	85%

Footnote Legend

- (1) Probation and the DOJ Monitor had not finalized the monitoring tools needed to measure compliance with the Provision. As a result, the Provision was not included in our review.
- (2) Provisions that are in substantial compliance (achieved a 90% or better compliance level) are highlighted in green. Provisions with compliance levels that dropped from the previous review are highlighted in red.
- (3) Probation management is revising the monitoring tool to more closely align with the Provision requirements. As a result, we did not review this provision.

**DOJ Settlement Agreement Provision
Monitoring Results
For The Monitoring Period June Through August 2011**

Camp/Unit	Date		Compliance Percentage for A-C Monitored Provisions (1)																	
	Review Date	Period Reviewed	10	11	12	14	16	18	19	20	21	23	24	25	29	32	34	45	46	Average
Camp Gonzales	6/9/2011	Apr-Jun 2011	95%	N/A	88%	82%	100%	95%	97%	81%	N/A	94%	91%	97%	51%	83%	98%	17%	100%	85%
Camp Miller	6/22/2011	May-Jun 2011	91%	N/A	90%	80%	100%	98%	98%	92%	N/A	100%	100%	94%	52%	88%	100%	24%	100%	87%
Camp Kilpatrick	6/29/2011	May-Jun 2011	86%	N/A	78%	78%	100%	91%	94%	76%	N/A	96%	100%	91%	57%	95%	94%	18%	91%	83%
Camp Scott	7/6/2011	May-Jul 2011	97%	N/A	90%	81%	100%	90%	100%	88%	N/A	92%	100%	97%	72%	96%	92%	13%	100%	87%
Camp Scudder	7/11/2011	Jun-Jul 2011	100%	N/A	97%	97%	100%	88%	100%	90%	N/A	97%	100%	98%	52%	88%	100%	11%	94%	87%
Camp Mendenhall	7/13/2011	Jun-Jul 2011	95%	N/A	96%	83%	100%	94%	96%	88%	N/A	100%	100%	97%	95%	86%	100%	8%	100%	89%
Camp Munz	7/19/2011	Jun-Jul 2011	97%	N/A	84%	79%	100%	95%	94%	91%	N/A	97%	98%	94%	52%	81%	100%	7%	100%	85%
Camp Rockey	7/21/2011	Jun-Jul 2011	95%	N/A	81%	78%	100%	93%	98%	89%	N/A	100%	100%	98%	75%	88%	96%	0%	100%	86%
Camp Paige	7/26/2011	Jun-Jul 2011	97%	N/A	73%	82%	100%	85%	68%	82%	N/A	100%	100%	97%	53%	81%	100%	0%	79%	80%
Camp Afflerbaugh	7/28/2011	Jun-Jul 2011	99%	N/A	86%	83%	100%	91%	88%	85%	N/A	100%	100%	98%	56%	61%	100%	0%	100%	83%
Security Unit at CMYC	8/2/2011	Jun-Aug 2011	98%	93%	95%	82%	N/A	86%	55%	90%	N/A	N/A	N/A	96%	N/A	90%	N/A	28%	N/A	81%
Special Housing Unit at CMYC	8/2/2011	Jun-Aug 2011	100%	N/A	90%	N/A	N/A	77%	100%	84%	N/A	100%	N/A	100%	57%	80%	99%	0%	N/A	81%
Camp McNair	8/4/2011	Jun-Aug 2011	93%	N/A	93%	N/A	99%	72%	99%	88%	N/A	100%	98%	93%	94%	81%	88%	0%	100%	86%
Camp Jarvis	8/10/2011	Jun-Aug 2011	96%	N/A	83%	N/A	100%	93%	94%	95%	N/A	100%	91%	96%	74%	94%	100%	0%	94%	86%
Camp Onizuka	8/11/2011	Jun-Aug 2011	98%	N/A	96%	N/A	89%	94%	91%	100%	N/A	100%	94%	98%	73%	100%	94%	0%	100%	88%
Dorothy Kirby Center	8/16/2011	Jun-Aug 2011	99%	N/A	94%	80%	100%	81%	100%	82%	N/A	100%	99%	96%	80%	81%	100%	9%	100%	87%
CASIU	8/26/2011	May-Jul 2011	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	62%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	62%
DOJ Compliance Bureau	8/30/2011	Jul-2011	N/A	N/A	99%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	99%
Average Compliance Percentage			96%	93%	89%	82%	99%	89%	92%	88%	62%	98%	98%	96%	66%	86%	97%	8%	97%	85%

Footnote Legend

N/A Provision is not applicable to this camp/unit.

(1) See Attachment 2 for the title of each provision.